



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 6, 2017

VINCENT DEVITO ESQ., TREASURER
SEAL PAC SUPPORTING ELECTING AMERICAN
LEADERS PAC

ONE INTERNATIONAL PLACE - 44TH FL. C/O BOWDITCH & DEWEY, LLP
BOSTON, MA 02110

Response Due Date
04/10/2017

IDENTIFICATION NUMBER: C00570226

REFERENCE: AMENDED JULY QUARTERLY REPORT (04/01/2016 - 06/30/2016),
RECEIVED 08/03/2016

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. The totals listed on Line(s) 21(b), 21(c) and 23 Column B of the Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "EXECUTIVE/EXECUTIVE".

The Commission notes that the Committee previously submitted a description of its "best efforts" procedures. These procedures were deemed incomplete for the

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following reason(s):

Your procedures:

- did not indicate that you would update your reports to include the missing information. (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information and a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts", please refer to the Campaign Guide..

3. Schedule A of your report discloses an entry for a contributor with an aggregate year-to-date total of -\$5,000, which appears to reflect a refund of a contribution made in a prior year. Please be advised that the aggregate year-to-date total for a contributor should reflect only those contributions received within that calendar year. Please amend your report to provide the correct aggregate year-to-date total.

- Schedule B discloses an expenditure(s) for "CREATIVE FEES", "POSTAGE" and "PRINTING & MAILSHOP". If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report

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review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,

A handwritten signature in black ink, appearing to read "Romy Adame-Wilson". The signature is fluid and cursive, with the first name "Romy" being the most prominent.

Romy Adame-Wilson
Senior Campaign Finance Analyst
Reports Analysis Division